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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Karissa Jaylene Andrade,)	Case No. :25-cv-00124-SKO
Plaintiff,)	STIPULATION AND UNOPPOSED
vs.)	MOTION ORDER FOR
)	EXTENSION OF TIME; ORDER
Leland Dudek, ACTING)	(Doc. 11)
COMMISSIONER OF SOCIAL)	
SECURITY ¹ ,)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from April 18, 2025 to June 17, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION

¹ Leland Dudek became the Acting Commissioner of Social Security on February 16, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Leland Dudek should be substituted for Michelle King as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order
2 shall be extended accordingly.

3 This is Plaintiff's first request for an extension of time. Plaintiff respectfully
4 states that the requested extension is necessary due several merit briefs being due
5 on the same week. For the weeks of April 14, 2025 and April 21, 2025, Plaintiff's
6 Counsel has eleven merit briefs due. Counsel requires additional time to brief the
7 issues thoroughly for the Court's consideration. Defendant does not oppose the
8 requested extension. Counsel apologizes to the Defendant and Court for any
9 inconvenience this may cause.

10
11 Respectfully submitted,

12 Dated: April 1, 2025

PENA & BROMBERG, ATTORNEYS AT LAW

13
14 By: /s/ Jonathan Omar Pena
15 JONATHAN OMAR PENA
16 Attorneys for Plaintiff

17
18 Dated: April 1, 2025

19 JOSEPH T. MCNALLY
20 United States Attorney
21 MATHEW W. PILE
22 Associate General Counsel
23 Office of Program Litigation
24 Social Security Administration

25 By: */s/ Justin Lane Martin
26 Justin Lane Martin
27 Special Assistant United States Attorney
28 Attorneys for Defendant
(*As authorized by email on April 1, 2025)

ORDER

Pursuant to the parties' foregoing stipulation and unopposed motion (Doc. 11), and for good cause shown (Fed. R. Civ. P. 16(b)(4)),

IT IS ORDERED that Plaintiff shall have up to and including June 17, 2025, to serve Plaintiff's Motion for Summary Judgment on Defendant. All other dates in the Scheduling Order (Doc. 4) are enlarged accordingly.

IT IS SO ORDERED.

Dated: **April 2, 2025**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE